

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CLERK'S OFFICE

DEC 13 2005 2:54 PM
U.S. DISTRICT COURT
CLERK'S OFFICE

TOWN OF IPSWICH,)	
)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION
NATIONAL UNION FIRE INSURANCE COMPANY)	NO. 05-11114-MLW
OF PITTSBURGH, PA)	
)	
Defendant.)	
)	
)	

**JOINT MOTION TO EXTEND TWO DEADLINES
IN CASE SCHEDULING ORDER**

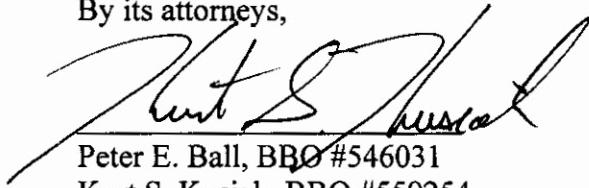
Plaintiff Town of Ipswich (“Ipswich”) and Defendant National Union Fire Insurance Company of Pittsburgh, PA (“National Union”) hereby jointly move this Court to extend two of the deadlines set forth in the scheduling order for this case as follows:

1) extend the deadline for filing initial disclosures under Fed. R. Civ. P. 26(a)(1)(E) from December 16, 2005 to February 24, 2006; and 2) extend the deadline to serve written discovery requests from January 3, 2006 to March 17, 2006.

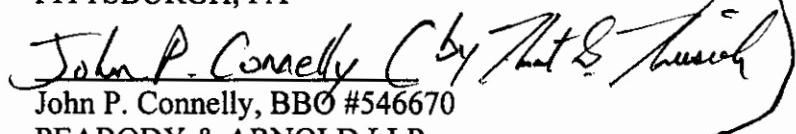
As grounds for this motion, Ipswich and National Union state that they are very close to settling this matter, after having attended mediation sessions occurring on November 4, 2005 and December 6, 2005. Ipswich requires Town committee approvals before any settlement can be approved, and those meetings cannot happen until early January.

The parties believe that it is in the best interests of both of the parties and this Court to have the mediation/ settlement process conclude before the parties incur time and expense with further pleadings such as initial disclosures and written discovery.

PLAINTIFF TOWN OF IPSWICH
By its attorneys,


Peter E. Ball, BBO #546031
Kurt S. Kusiak, BBO #559254
SALLY & FITCH LLP
225 Franklin Street
Boston, MA 02110
(617) 542-5542

DEFENDANT NATIONAL UNION
FIRE INSURANCE COMPANY OF
PITTSBURGH, PA


John P. Connelly, BBO #546670
PEABODY & ARNOLD LLP
30 Rowes Wharf
Boston, MA 02110
(617) 951-2100

Dated: December 12, 2005